

State of Oregon

Department of Environmental Quality

Memorandum

To: WOF PNW Threemile Project, LLC
Oregon Title V Operating Permit 25-0047-TV-01.
Eastern Region – AQ/Bend

Date: February 15, 2019

From: Walt West, P.E. *WW*
Eastern Region - AQ/Bend

Subject: Review of 2018 annual report and 2nd semi-annual compliance certification (SACC) for the period of 7/1/18 through 12/31/2018

Report	Report period	Date received	Deviations	Comments
SACC	7/1/18 – 12/31/18	2/15/19	None	None for the reporting period.
Annual Report	2018	2/15/19	None	All Pollutant emissions were below the PSELs.
Emission Fee Report	2018	2/15/19	None	WOF PNW reported 72.73 tons of total assessable emissions using the permitted emissions option for PM ₁₀ , NO _x , SO ₂ , and VOCs.

*SACC = Semi-annual compliance certification.

Plant Site Emissions:

The annual emissions for each 12-month period were reported. The highest emissions for the calendar year as follow:

Pollutant	2017 emissions	Permit Limit
	(tons/yr)	
Particulate matter (PM)	17.59	24
Particulate matter (PM ₁₀)	13.88	15
Particulate matter (PM _{2.5})	12.57	15
Sulfur dioxide (SO ₂)	2.82	39
Nitrogen oxides (NO _x)	31.21	39
Carbon monoxide (CO)	142.87	245
Volatile organic compounds (VOC)	5.75	39
Greenhouse Gasses (GHGs)	32,529	74,000

Emissions based on 8,539 hours of operation for ENG1, 8,448 hours of operation for ENG2, 607 hours of operation for ENG3. The combined flares burned 22.20 MMscft of biogas.

Follow-up actions: None Needed